



State of Washington
Department of Fish and Wildlife

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October 19, 2012

William W. Stelle, Jr., Regional Administrator
NOAA Fisheries, Northwest Region
7600 Sand Point Way
Seattle, WA 98115

Dear Mr. Stelle,

The Washington Department of Fish and Wildlife (Department) developed the Elwha River Chinook Hatchery and Genetic Management Plan (HGMP), placed it on our web page on July 5, 2012, announced its availability, and solicited public comment through August 5, 2012. Please consider the public comments and Department responses an official supplement to the previously submitted HGMP and consider them in making any determination or taking any actions pursuant to 50 C.F.R. §§ 223.203(b) and 223.209. The Department is providing this supplement to our consistent with the requirements of a 2003 Settlement Agreement with Washington Trout.

A total of 13 individuals or organizations provided comments to the Department during the public comment period. The comments ranged from short paragraphs to extensive reviews, all of which are available in their entirety on the department's website at the following address:
<http://wdfw.wa.gov/hatcheries/hgmp/>.

We received comments from: Mr. Nick Gayeski at the Wild Fish Conservancy (WFC); Mr. Andy Appleby and Dr. Peter Paquet representing the Hatchery Scientific Review Group – Washington (HSRG); Mr. Bryan Irwin, Coastal Conservation Association (CCA); Mr. Pete Solverel, The Conservation Angler (TCA); and from 9 members of the public via email.

We have included their comments and the Department's responses in the attached package. The Department has provided responses to the comments to promote a broad review by NOAA Fisheries and others interested in Puget Sound artificial production programs, and the recovery of Elwha River Chinook salmon.

The commentators provided several substantive issues for Department consideration:

1. Several members of the public requested that no hatchery production take place, and that the Elwha River salmon be allowed to re-colonize the river naturally.

The Department recognizes the primary purpose of the Elwha chinook program is to prevent extinction and to maintain the diversity and identity of the existing population during the Preservation phase. During the Recolonization phase, the objective of the chinook program is to achieve total spawning abundance goals, to maintain stock productivity, to increase the abundance and distribution of natural-origin spawners (HGMP Section 11.1.1). The Department supports the recommendation of the HSRG to adopt their standards for operating the hatchery program for a "Primary" population during the "local adaption" phase.

2. The HSRG, WFC, CCA, and TCA noted a lack of specificity in the draft HGMP regarding triggers and actions to be taken, and requested that the HGMP clearly develop and define the triggers to be used and the decision tree from which these triggers are developed.

The HGMP will direct operations of the Elwha Chinook hatchery during the Preservation and Recolonization phases of the Elwha salmon recovery plan as defined in Section 1.7 of the HGMP, described in Section 11.1.1, and displayed in the Performance and Trigger table. The Department has adopted the triggers provided as guidelines by the Elwha Working Group, and has incorporated them into this table. Triggers to progress from the Recolonization phase to the Local Adaptation are likewise displayed in the table in Section 11.1.1, but the Department does not expect to transition to the Local Adaptation phase prior to developing a revised HGMP using data collected during the Preservation and Recolonization phases. The biological rationale for the numbers used in this table and the evaluation were developed by the inter-agency Elwha Working Group, and triggers for the transition to the Local Adaptation phase will be informed by data to be collected in the 2 earlier phases.

To address the concerns of several reviewers, the Department added the following language to the HGMP:

"The above triggers for each performance indicator were developed to identify whether the goals and objectives for each phase of fish restoration have been achieved. The triggers, developed by the Elwha Monitoring Group (EMG), are based on data, analyses, and inferences by scientists with specific expertise in the Elwha River restoration. The WDFW recognizes that there is uncertainty in the trigger

points and supports additional scientific review and the collection of additional data. To ensure that the trigger points are fully informed by a broad range of scientific expertise, WDFW will convene a forum of scientists by March 2013 to review the abundance trigger points relative to the goals and objectives of the Elwha River Fish Restoration Plan. Such review will occur on an appropriate time-frame (usually annually). Our expectation is that, after additional review of the triggers, WDFW and LEKT will provide any recommended changes in the triggers for NMFS concurrence, based on any new information and analyses."

3. The HSRG, WFC, CCA and TCA noted the need for the HGMP to identify hatchery-produced chinook with an external mark to facilitate harvest management issues and to allow identification and management of adult returns as the population transitions from the Recolonization phase to the Local Adaptation phase of recovery.

The Department modified the HGMP to address these concerns. Because of the need to determine harvest in pre-terminal fisheries, and to manage adult returns as the population transitions to the Local Adaptation phase, the Department proposes to adipose-clip all subyearling Chinook releases from the Elwha Chinook program. Beginning with brood year 2012, the Department will tag and mark (Ad/CWT) 250,000 sub-yearling chinook to assess exploitation rates on this portion of the production. It is our intent to adipose-clip all sub-yearling chinook releases beginning in 2016. Currently, all yearling chinook (400,000) are released with a coded-wire tag, but will not receive an adipose clip. The specifics of marking are described in Section 10.7 of the submitted HGMP, and the document will be updated to reflect these current commitments to marking hatchery chinook releases.

4. The WFC and TCA comment that the scale of the proposed hatchery brood program was too large.

The Department's Chinook hatchery program is designed to maintain current releases through the Preservation and Recolonization phases. It is not expected that the Chinook salmon population in the Elwha River will be in the Local Adaptation phase while the requested HGMP is in effect. The Elwha Monitoring Group provided the department with initial guidelines to develop triggers to transition to the Local Adaptation phase of recovery (Section 11.1.1 – Performance and Trigger table) based on biological and physical parameters to guide the reduction of the Chinook hatchery program as Chinook salmon colonize and establish viable populations in the watershed.

The abundance threshold for Chinook salmon spawned in the hatchery is 1,700 adults, consistent with the number of spawners needed to produce 2.9 million

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hatchery Chinook (2.5 million sub-yearlings and 400K yearlings). This threshold value was selected by the Department, on preliminary recommendation from the Elwha Monitoring Group, for both the Preservation and Recolonization phases and does not increase as the total number of returning spawners increases. During the subsequent Local Adaptation phase, the number of Chinook used for hatchery production will be reduced by 20% for every 1,000 fish increase in natural origin spawner abundance.

We expect our mutual commitment to the recovery of the Chinook salmon population in the Elwha River and elsewhere in Puget Sound to benefit by a responsible approach to hatchery production in the region.

Sincerely,



James B. Scott, Jr.
Assistant Director, Fish Program

cc: Ron Warren, Region 6 Fish Program Manager, WDFW
Heather Bartlett, Hatcheries Division Manager, WDFW
Mike Grossmann, Senior Counsel, Washington State Office of Attorney General
Doug Morrill, Natural Resources Director, Lower Elwha Klallam Tribe
Steve Suagee, General Counsel, Lower Elwha Klallam Tribe
Ken Berg, USFWS